## **COLUMBIA** SAVINGS BANK

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June 13, 2006

Federal Housing Finance Board 1625 Eye St. NW Washington, DC 20006

Att: Public Comments

Federal Housing Finance Board Proposed Rule: Excess Stock Restrictions and Retained Earnings Requirements for the Federal Home Loan Banks RIN # 3069-AB30 Docket Number 2006-03

Columbia Savings Bank is a member of the Federal Home Loan Bank of Cincinnati, and as such, uses the credit facilities of the Cincinnati bank extensively. Consequently, the Federal Home Loan Bank of Cincinnati stock we carry on our balance sheet represents a significant asset and income source. Your proposed rule causes us serious concerns about the future quality and value of our significant investment in the Cincinnati Bank. Many, many experienced professionals in our industry have grave concerns about the potential damage this rule could due to the Cincinnati operation.

My bank's concerns aside, we are worried about the effects on the citizens of our nearby neighborhoods. Columbia is a small inner city bank. Our neighbors rely on the low to moderate income mortgage initiatives that the Cincinnati Federal Home Loan Bank sponsors. Those programs may not survive if your proposed rule becomes a reality. I urge you to withdraw this proposal.

Sincerely.

Michael J. Vank, President and CEO

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cc: Rep. John Boehner Rep. Steve Chabot Sen. Michael DeWine Sen. George Voinovich

Sen. Jim Bunning